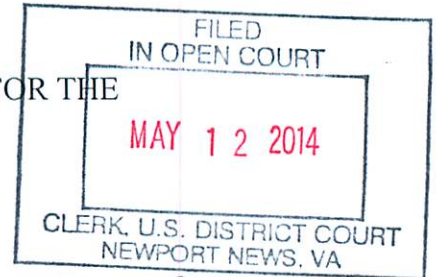


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Newport News Division



UNITED STATES OF AMERICA

v.

JEFFREY WASHINGTON,
a/k/a "Lef,"

Defendant.

CRIMINAL NO. 4:14CR 32

FILED UNDER SEAL

18 U.S.C. § 1349
Conspiracy to Commit Bank Fraud
(Count 1)

18 U.S.C. §§ 1344 and 2
Bank Fraud
(Counts 2 - 11)

18 U.S.C. §§ 1028A and 2
Aggravated Identity Theft
(Counts 12 - 18)

18 U.S.C. §§ 2314 and 2
Interstate Transportation of Property
Converted or Taken by Fraud
(Counts 19 - 20)

INDICTMENT

May 2014 Term - At Newport News, Virginia

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. Beginning on a date unknown to the Grand Jury, but no later than in or about April 2012, and continuing until at least in or through April 2014, in the Eastern District of Virginia, and elsewhere, JEFFREY WASHINGTON, a/k/a "Lef," the defendant herein, and other conspirators, both known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate and agree with each other and others known and unknown to the Grand Jury, to commit the following offense against the United States:

a. To knowingly execute and attempt to execute a scheme or artifice to defraud and to obtain money, funds, credits, assets, securities owned by and under the custody and control of a financial institution as defined under Title 18, United States Code, Section 20, by means of materially false and fraudulent pretenses, representations and promises in violation of Title 18, United States Code, Section 1344.

WAYS, MANNER AND MEANS OF THE CONSPIRACY

The ways, manner and means by which the foregoing objective of the conspiracy to commit bank fraud were to be accomplished included, but were not limited to, the following:

2. The primary purpose of the conspiracy and the scheme and artifice was for the defendant and conspirators to obtain through fraudulent means United States currency from various financial institutions, to include, but not limited to, Wells Fargo Bank, PNC Bank, TD Bank, Capital One Bank and M&T Bank, by falsely impersonating account holders and making fraudulent withdrawals of United States currency from the accounts of said financial institution customers.

3. It was a part of the conspiracy and the scheme and artifice that the conspirators unlawfully obtained bank account and identification information of the account holders of various financial institutions.

4. It was further a part of the conspiracy and the scheme and artifice that the conspirators used the unlawfully obtained identification information of the aforementioned account holders to create counterfeit and false identifications and credit cards bearing the names and other identification information of account holders, but bearing the photographs of conspirators.

5. It was a further a part of the conspiracy and the scheme and artifice that the conspirators traveled from New York to other states and obtained business licenses using the unlawfully obtained identification information of others.

6. It was further a part of the conspiracy and the scheme and artifice that the conspirators would fraudulently impersonate account holders of various financial institutions, including Capital One Bank, Wells Fargo Bank, M&T Bank, TD Bank and PNC Bank, in order to obtain account and balance information and to make withdrawals of funds from the accounts.

7. It was further a part of the conspiracy and the scheme and artifice that the conspirators would open business accounts at financial institutions, utilizing the unlawfully obtained identification information of financial institution account holders, and then fraudulently transfer funds between existing personal accounts and the newly created business accounts for subsequent withdrawals by the conspirators.

8. It was further a part of the conspiracy and the scheme and artifice that the conspirators traveled to various financial institutions, including Capital One Bank, Wells Fargo Bank, M&T Bank, TD Bank and PNC Bank, in Pennsylvania and Virginia and through other states, in order to impersonate account holders and fraudulently obtain funds from their accounts.

9. It was further a part of the conspiracy and the scheme and artifice that the conspirators fraudulently obtained credit cards, rental cars and other goods and services using the fraudulently obtained information of the aforementioned financial institution customers.

10. It was further a part of the conspiracy and the scheme and artifice that the conspirators obtained and utilized multiple and changing cellular telephones, some of which were pre-paid with no subscribed information, to communicate with each other and to make telephone calls to financial institutions for the purpose of inquiring as to bank account balances

prior to fraudulently transferring funds.

11. It was further a part of the conspiracy and the scheme and artifice that the conspirators obtained and/or fraudulently transferred to their control at least over \$200,000 in United States currency by impersonating actual account holders of various financial institutions and provided funds to each other and others in furtherance of the conspiracy.

(In violation of Title 18, United States Code, Sections 1349 and 1344.)

COUNTS TWO THROUGH ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the allegations contained in Paragraphs 2 through 11 of Count One as if fully set forth herein.
2. On or about the dates and in the manner set forth below, in the Eastern District of Virginia, JEFFREY WASHINGTON, a/k/a "Lef," the defendant herein, aided and abetted by others, and along with other conspirators known and unknown to the Grand Jury, knowingly and willfully executed and attempted to execute a scheme and artifice to defraud and to obtain the moneys, funds, credits, assets, securities owned by and under the custody and control of the financial institutions identified herein, each of which qualifies as a financial institution as defined under Title 18, United States Code, Section 20, by means of the materially false and fraudulent pretenses, representations and promises identified below:

Count	Date of Transaction (on or about)	Description / Purpose of Transaction
2	7/30/2012	Conspirator impersonated Capital One Bank account holder A.S. at a Capital One Bank location in Lorton, Virginia, and opened a business account in the name of Custom Elegance. Conspirator then fraudulently transferred \$50,000 from A.S.'s personal account (last four digits 6010) into the newly created business account and made various cash withdrawals and debits.
3	9/11/2012	Conspirator impersonated Wells Fargo Bank account holder N.B. at a Wells Fargo Bank location in Stafford, Virginia, and opened a business account in the name of Rata Designs. Conspirator then fraudulently transferred \$17,000 from N.B.'s personal account (last four digits 5117) into the newly created business account and made a cash withdrawal of \$10,000.
4	10/10/2012	Conspirator impersonated Wells Fargo Bank account holder L.T. at a Wells Fargo Bank location in Oakton, Virginia, and fraudulently withdrew approximately \$4,400 from L.T.'s personal account (last

		four digits 8953).
5	10/10/2012	Conspirator impersonated Wells Fargo Bank account holder L.T. at a Wells Fargo Bank location in Oakton, Virginia, and opened a business account in the name of MT Realty Investments. Conspirator then fraudulently transferred approximately \$55,000 from L.T.'s personal account (last four digits 9610) into the new business account and made a cash withdrawal of \$16,000.
6	1/08/2013	Conspirator impersonated TD Bank account holder V.D. and opened a business account in the name of Vadell International at a TD Bank location in Fairfax, Virginia. Conspirator transferred \$20,000 from V.D.'s account (last four digits 0758) and made a cash withdrawal of \$16,000.
7	2/10/2013	Conspirator impersonated TD Bank account holder N.M. and opened a business account in the name of Tamehra Internationale at a TD Bank location in Alexandria, Virginia. Conspirator transferred \$14,044.87 from N.M.'s account (last four digits 0658) and then made a cash withdrawal of \$13,500 on February 11, 2013.
8	2/11/2013	Conspirator impersonated Wells Fargo account holder C.A. and opened a business account in the name of Antal Internationale at a Wells Fargo bank location in Newport News, Virginia.
9	4/18/2013	Conspirator impersonated Wells Fargo Bank customer O.Z. at a Wells Fargo Bank location in Glen Allen, Virginia, and opened business accounts in the name of O.Z. Graphics and Media. Conspirator then made fraudulent online transfers from accounts belonging to O.Z. (last four digits 9923 and 6657) to the newly created business accounts and made a cash withdrawal of approximately \$5,000.
10	4/19/2013	Conspirator impersonated Wells Fargo Bank customer S.B. at a Wells Fargo Bank location in Williamsburg, Virginia, and opened a business account in the name of Burdick Consulting Group. Conspirator then made transfers from S.B.'s personal account (last four digits 3866) in the amount of \$13,234.27 and made a cash withdrawal of approximately \$11,000.
11	8/30/2013	Conspirator impersonated Wells Fargo Bank account holder J.B. at a Wells Fargo Bank location in Ashland, Virginia, and attempted to open a business account in the name of JB Confection.

(In violation of Title 18, United States Code, Sections 1344 and 2.)

COUNTS TWELVE THROUGH EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the allegations contained in Paragraphs 2 through 11 of Count One as if fully set forth herein.
2. On or about the dates and in the manner set forth below, in the Eastern District of Virginia, JEFFREY WASHINGTON, a/k/a "Lef," the defendant herein, aided and abetted by others, and along with other conspirators known and unknown to the Grand Jury, did unlawfully, knowingly and intentionally transfer, possess and use, without lawful authority, a means of identification of another during and in relation to felony violations of provisions contained in chapter 63 of Title 18 of the United States Code, to wit: Conspiracy to Commit Bank Fraud, in violation of Title 18, United States Code, Section 1349, and Bank Fraud, in violation of Title 18, United States Code, Section 1344, as follows:

Count	Date of Transaction (on or about)	Means of Identification	Description/Purpose of Transaction	Felony Violation
12	7/30/2012	Name and account number of A.S. (last four digits 6010)	Conspirator impersonated A.S. and fraudulently transferred \$50,000 from A.S.'s Capital One Bank account.	18 U.S.C. §§ 1349 & 1344
13	9/11/2012	Name and account number of N.B. (last four digits 5117)	Conspirator impersonated N.B. and fraudulently obtained \$17,000 from N.B.'s Wells Fargo Bank account.	18 U.S.C. §§ 1349 & 1344
14	10/10/2012	Name and account number of L.T. (last four digits 9610)	Conspirator impersonated L.T. and fraudulently obtained \$16,000 from L.T.'s Wells Fargo Bank	18 U.S.C. §§ 1349 & 1344

			account.	
15	1/08/2013	Name and account number of V.D. (last four digits 0758)	Conspirator impersonated V.D. and fraudulently obtained \$16,000 from V.D.'s TD Bank account.	18 U.S.C. §§ 1349 & 1344
16	2/10/2013	Name and account number of N.M. (last four digits 0658)	Conspirator impersonated N.M. and fraudulently obtained \$13,500 from N.M.'s TD Bank account.	18 U.S.C. §§ 1349 & 1344
17	4/18/2013	Name and account numbers of O.Z. (last four digits 9923 and 6657)	Conspirator impersonated O.Z. and fraudulently obtained \$5,000 from O.Z.'s Wells Fargo Bank accounts.	18 U.S.C. §§ 1349 & 1344
18	4/19/2013	Name and account number of S.B. (last four digits 3866)	Conspirator impersonated S.B. and fraudulently obtained \$11,000 from S.B.'s Wells Fargo Bank account.	18 U.S.C. §§ 1349 & 1344

(In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c) and 2.)

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the allegations contained in Paragraphs 2 through 11 of Count One as if fully set forth herein.
2. On or about July 30, 2012, in the Eastern District of Virginia and elsewhere, JEFFREY WASHINGTON, a/k/a "Lef," the defendant herein, aided and abetted by others, and along with other conspirators known and unknown to the Grand Jury, did unlawfully transport, transmit and transfer in interstate commerce from the Commonwealth of Virginia to the State of New York, goods, wares, merchandise, securities and money of the value of \$5,000 or more, knowing the same to have been converted and taken by fraud.

(In violation of Title 18, United States Code, Sections 2314 and 2.)

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the allegations contained in Paragraphs 2 through 11 of Count One as if fully set forth herein.

2. On or about April 19, 2013, in the Eastern District of Virginia and elsewhere, JEFFREY WASHINGTON, a/k/a "Lef," the defendant herein, aided and abetted by others, and along with other conspirators known and unknown to the Grand Jury, did unlawfully transport, transmit and transfer in interstate commerce from the Commonwealth of Virginia to the State of New York, goods, wares, merchandise, securities and money, of the value of \$5,000 or more, knowing the same to have been converted and taken by fraud.

(In violation of Title 18, United States Code, Sections 2314 and 2.)

UNITED STATES v. JEFFREY WASHINGTON, 4:14CR 32

A TRUE BILL:

REDACTED COPY

FOREPERSON

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